

**Utah Department of Environmental Quality
Division of Solid and Hazardous Waste
FACT SHEET**



May 2006

Class 3 Permit Modification

Mustard Baseline Ton Container Processing for the Liquid Incinerators and Metal Parts Furnace at the Tooele Chemical Agent Disposal Facility (TOCDF), Utah

The Tooele Chemical Agent Disposal Facility (TOCDF), located approximately 15 miles south of Tooele, Utah, is preparing to start Mustard Agent Processing for Baseline Ton Containers in the Metal Parts Furnace (MPF) and the Liquid Incinerators (LICS). The MPF is a roller-hearth incinerator consisting of a Primary Combustion Chamber and a Secondary Combustion Chamber. A LIC consists of a Primary Combustion Chamber and a Secondary Combustion Chamber. The Primary Combustion Chamber is where agent is thermally treated. Exhaust gases enter the Secondary Combustion Chamber where they are incinerated to ensure complete combustion of any chemical warfare agent fumes.

Ton containers are brought into the facility and punched with a hydraulic punch, and then the liquid agent is drained into storage tanks and subsequently fed to the primary combustion chamber of the LICs. Mustard heels (liquid and solid) remain in the ton container for processing in the MPF. Baseline processing means treating munitions using the treatment process described above without system modifications such as solids washout and neutralization or stack gas filtration using sulfur impregnated carbon.

The Utah Division of Solid and Hazardous Waste (DSHW) oversees and has permitted operations at TOCDF under the Resource Conservation and Recovery Act (RCRA). RCRA is a federal law written to protect human health and the environment, reduce waste, conserve energy, and to reduce or eliminate the generation of hazardous waste. RCRA is codified under the Code of Federal Regulations, title 40, parts 260 through 299. The DSHW is authorized by the Environmental Protection Agency to enforce hazardous waste regulations in Utah. The State of Utah has codified its own rules under the Utah Administrative Code (the Rules) Sections R315-1 to R315-9, R315-12 to R315-14, R315-16, R315-50, R315-101, and R315-102.

The Baseline Processing will be conducted on mustard Ton Containers with liquid mercury contamination at

concentrations less than one part per million. A few years ago at the Chemical Agent Munitions Disposal System (CAMDS) facility, a characterization program was performed on approximately 100 ton containers. The information shows a correlation between liquid agent and the solid heel, that when the liquid agent is less than one part per million, the concentration of mercury in the heel will be low enough to meet MACT emission standards using baseline processing.

The liquid mustard will be sampled from every mustard ton container (6398) in the Deseret Chemical Depot Stockpile to determine which ton containers are eligible for baseline processing. During the trial burns, the LICs will process liquid agent and the MPF will process both liquid and solid/sludges from the mustard agent.

The TOCDF has submitted two Trial Burn Plans, one for the LICs and one for the MPF to conduct testing to provide emission data from incinerating the baseline ton containers. While conducting these tests, the Permittees (EG&G/Army) will be required to meet the performance standards outlined in the TOCDF Hazardous Waste Permit.

In accordance with R315-3-6.3(b)(5), the Executive Secretary of the Solid and Hazardous Waste Control Board has determined that the feeding of Baseline Ton Containers to the MPF and LICs will be protective of human health and the environment. The Executive Secretary proposes to allow the Permittees to conduct the tests as outlined in the Trial Burn Plans and appendices. The revised Permit language, Trial Burn Plans, and appendices, are proposed for public review and comment.

The information may be viewed at the locations listed below.

- DSHW Offices, Martha Hughes Cannon Health Building, 4th floor, 288 North 1460 West, Salt Lake City, Utah, between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday from May 2, 2006 through June 15, 2006, except for State holidays.

- Tooele Chemical Stockpile Outreach Office, 54 South Main Street, Tooele, Utah, during normal business hours.

In accordance with R315-4-1.10, a Public Comment Period is being held to collect public input concerning these proposed test plans and modified permit language.

The comment period is scheduled to begin May 2, 2006, and will conclude June 15, 2006. A public hearing will be held on May 31, 2006, at 6:00 p.m. at the Tooele County Courthouse, South Auditorium, 47 South Main Street, Tooele, Utah, concerning these test plans, appendices and permit change language. Public comments will be collected at the hearing. Anyone wishing to make comments is welcome to do so at the hearing or to submit written comments to the following address:

Mr. Dennis R. Downs
Executive Secretary
Utah Solid and Hazardous Waste Control Board
P.O. Box 144880
Salt Lake City, UT 84114-4880

Written comments on this modification must be received no later than 5:00 p.m. on June 15, 2006. Public comments will be considered in the Executive Secretary's final decision on the Mustard Baseline Processing For Ton Containers in the LICs and MPF.

Additional Information

If you would like more detailed information or have questions please contact:

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http://www.hazardouswaste.utah.gov/HWBranch/CDSection/CDS_PVA.htm